

**LEE LITIGATION GROUP, PLLC**

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

JENIE MARIANI and JOHN DOE, on behalf of  
themselves and others similarly situated,

Plaintiffs,

v.

OTG MANAGEMENT, INC., and LAGUARDIA  
USA LLC,

Defendants.

No. 16 Civ. 1751

**NOTICE OF PLAINTIFF'S UNOPPOSED MOTION FOR PRELIMINARY APPROVAL  
OF CLASS ACTION SETTLEMENT, CONDITIONAL CERTIFICATION OF THE  
SETTLEMENT CLASS, APPOINTMENT OF PLAINTIFF'S COUNSEL AS CLASS  
COUNSEL, AND  
APPROVAL OF PLAINTIFF'S PROPOSED NOTICE OF SETTLEMENT**

For the reasons set forth in the Memorandum of Law in Support of Plaintiff's Motion for Preliminary Approval of the Class Action Settlement, Conditional Certification of the Settlement Class, Appointment of Plaintiff's Counsel as Class Counsel, and Approval of Plaintiff's Proposed Notice of Settlement ("Motion for Preliminary Approval"), and the Declaration of C.K. Lee in Support of Plaintiff's Motion for Preliminary Approval ("Lee Declaration"), Plaintiff respectfully requests that the Court enter an Order:

- (1) granting preliminary approval of the Settlement Agreement and Release ("Settlement Agreement"), Decl. of C.K. Lee ("Lee Decl.") Ex. A;

- (2) certifying the proposed class for settlement purposes only;
- (3) appointing Lee Litigation Group, PLLC (“Lee Litigation Group”) (“Plaintiff’s Counsel”) as Class Counsel;
- (4) approving the proposed Notice of Proposed Settlement of Class Action Lawsuit and Fairness Hearing, Lee Decl. Ex. B;
- (5) approving Advanced Litigation Strategies, LLC as Claims Administrator; and
- (6) granting such other, further, or different relief as the Court deems just and proper.

\* \* \*

Plaintiff has contemporaneously submitted a Proposed Order, attached hereto as **Exhibit A**, for the Court’s convenience.

Dated: March 13, 2017  
New York, New York

Respectfully submitted,

By: /s/ C.K. Lee  
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*Attorneys for Plaintiff and the Class*